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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**
17

18 GERALD ARMSTRONG,

19 Plaintiff,

20 vs.

21 CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California corporation;
22 and the RELIGIOUS TECHNOLOGY
CENTER, a California corporation.

23 Defendants.
24
25 _____/

CASE NO. CV-N-97-00670 ECR (RAM)

**DECLARATION OF KENDRICK L.
MOXON, ESQ. IN SUPPORT OF
DEFENDANTS' REPLY ON THEIR
MOTION FOR ATTORNEYS' FEES**

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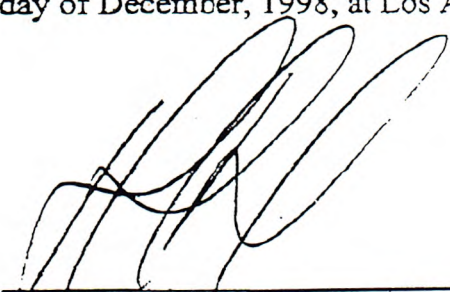
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1 I, Kendrick L. Moxon, declare as follows:

2 1. I make the following statements of my own personal knowledge, and if called to
3 testify thereto, I could and would do so competently. I am an attorney admitted to practice
4 in all courts of California, as well as numerous federal courts in the Ninth Circuit, the
5 District of Columbia and elsewhere. I have represented the Church of Scientology
6 International ("CSI") for many years. As a result of my experience on behalf of CSI and
7 as a consultant to counsel in that matter, I attended a deposition of Gerald Armstrong taken
8 on December 4, 1998 in Tampa, Florida, in the case of *Liebreich v. Church of Scientology*
9 *Flag Service Organization, Inc., et al.*, Hillsborough County, Florida Circuit Court Case
10 No. 97-01235. The transcript is not yet available from the Court reporter.

11 2. During his deposition, Armstrong was questioned regarding his relationship with
12 a Robert Minton. Armstrong testified that Minton has given him a total of \$100,000, in
13 November of 1997 and January of 1998, of which \$75,000 was for Armstrong's use in the
14 above-captioned litigation and \$25,000 was for Armstrong's personal use. Armstrong
15 testified that \$75,000 was paid directly into the trust account of Armstrong's attorney,
16 George Abbott, in Minden, Nevada. Armstrong further testified that whatever portion of
17 the \$75,000 has not already been spent on litigation costs by Mr. Abbot, remains in Mr.
18 Abbott's trust account, and that approximately \$5,000 still remains of the \$25,000
19 provided to him for personal use.

20 I declare under penalty of perjury under the laws of the United States that the
21 foregoing is true and correct. Executed this 7th day of December, 1998, at Los Angeles,
22 California.

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Kendrick L. Moxon